

THE HONORABLE BARBARA JACOBS ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TATIANA WESTBROOK, an individual;
JAMES WESTBROOK, an individual; HALO
BEAUTY PARTNERS, LLC, a Nevada Limited Liability Company,
NO. 2:20-cv-01606-BJR

Plaintiffs,

DECLARATION OF KIM FULMER

v.

KATIE JOY PAULSON, an individual;
WITHOUT A CRYSTAL BALL, LLC, a
Minnesota Limited Liability Company; and
DOES 1 through 100, inclusive,

Defendants.

I, Kim Fulmer, hereby state as follows:

1. I am over the age of eighteen and am competent to testify to the facts alleged herein.

2. I am a resident of North Carolina.

3. I was a moderator for the live stream of one of Katie Joy Paulson's YouTube channel, "Without a Crystal Ball," from in or around July 2019 through in or around August 2019.

DECLARATION OF KIM FULMER-1
(2:20-CV-01606-BJR)

CARROLL, BIDDLE, & BILANKO, PLLC
1000 2nd Avenue, Suite 3100
Seattle, WA 98104

1 4. I became a moderator for Ms. Paulson after being a subscriber to her YouTube
2 channel for about a month, starting in or around June 2019.

3 5. Ms. Paulson reached out to me for help moderating her YouTube livestream after
4 I had interacted with her as a subscriber.

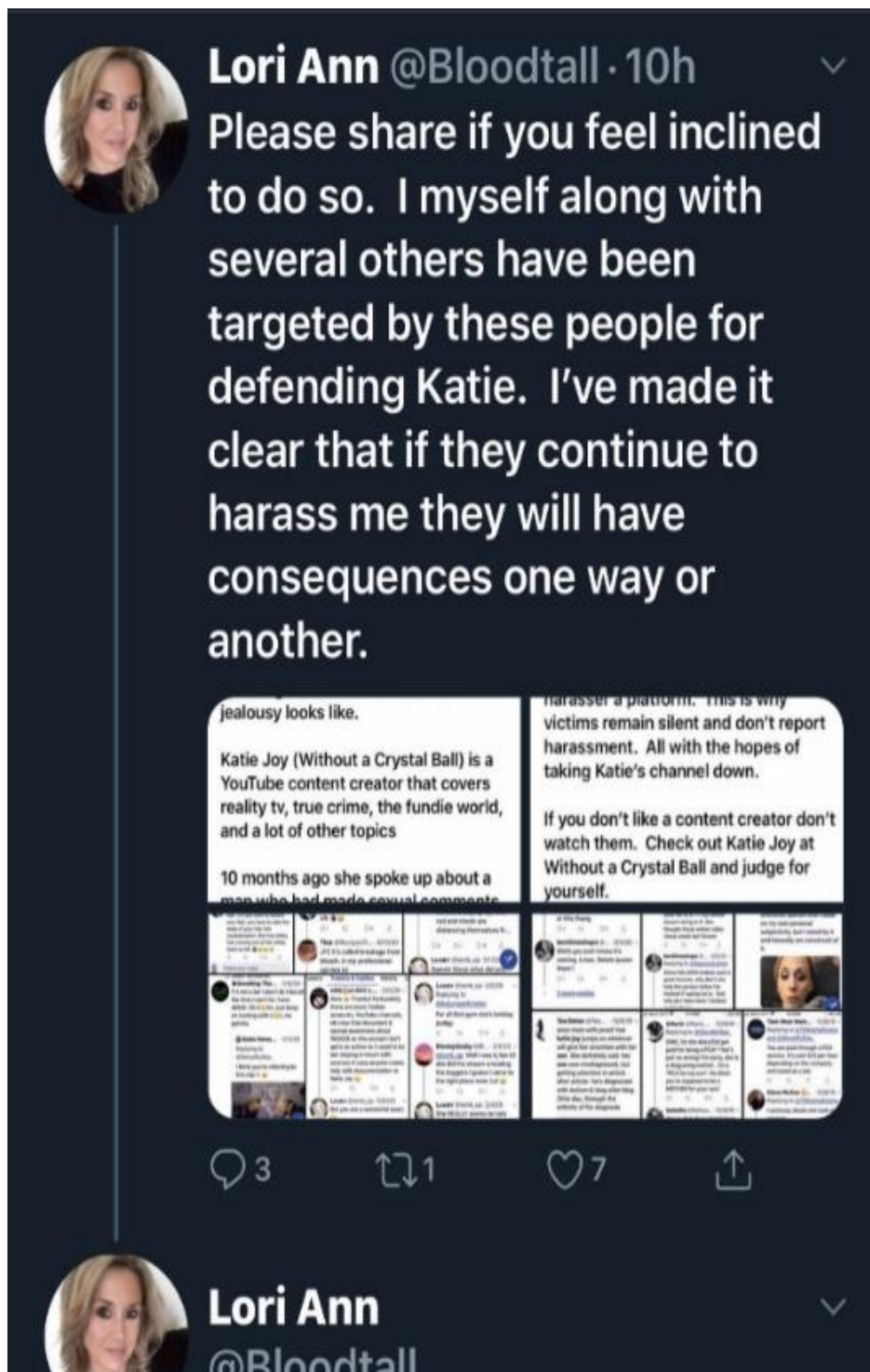
5 6. Part of my duties as a moderator was to delete negative comments written
6 regarding Ms. Paulson in the live stream chat boxes.

7 7. In addition to moderating for Ms. Paulson I also have my own YouTube channel
8 called "Unveiling the Mask." I also have a Twitter account with the username @unveiling_.

9 8. In around August 2019, I had a falling out with Ms. Paulson, and she blocked me
10 as a moderator.

11 9. After I stopped moderating for Ms. Paulson, another subscriber and supporter of
12 Ms. Paulson's YouTube channel and Twitter page, "Without a Crystal Ball," and
13 @woacbofficial respectively, who I know to be Lori Ann Barnhart (Twitter usernames Lori Ann
14 / @bloodtall and @lab05059) threatened multiple individuals, including myself, with violence
15 on Twitter. Specifically, because of my falling out with Ms. Paulson, Lori Ann Barnhart made
16 threats against me and threatened to have me murdered by a biker gang. Below are actual
17 screenshots from May 2020 that I obtained from my Twitter account that contain Ms. Barnhart's
18 public threats of violence against myself and others.







10. After receiving the threats of violence, I personally conducted an investigation and determined that Ms. Barnhart is a resident of the State of Washington, and that she works for the Office of the Secretary of Transportation for the State of Washington. Here is a link to the Washington Office of the Secretary of Transportation, which lists Ms. Barnhart as “Capital Projects and Business Services Planner” <https://wsdot.wa.gov/sites/default/files/2020/03/27/PT->

11. I have observed tweets from the @woacbofficial Twitter page, which is I am informed by Ms. Paulson herself that she operates. In certain tweets, Ms. Paulson has interacted with Ms. Lori Ann Barnhart, and vice versa. In one tweet, Ms. Paulson refers to an account that I believe belongs to Ms. Barnhart (Lori Ann/ @bloodtall) as one of her “fiercest and loyalist” supporters. Below are some screenshots of tweets that I obtained from my Twitter account:



Kirsten Conway
@LaFouRoux

Replying to @woacbofficial

You're amazing, Katie. Such a strong person. I want to be like you when I grow up (even though I'm older than you...lol).

5:55 PM · 7/9/20 · Twitter for Android

5 Likes



Katie Joy @woacbofficial · 7/9/20
Replying to @LaFouRoux

My fiercest and loyalist - next to @Bloodtall & @ARealHousewife0 😊

1



4



12. Below are screenshots of additional tweets that I obtained from my Twitter account showing a relationship between Lori Ann Barnhart (@Bloodtall) and Katie Joy Paulson

(@woacbofficial). The screenshot of the first tweet is from May 2020 and the second screenshot is from a tweet from November 6, 2020.

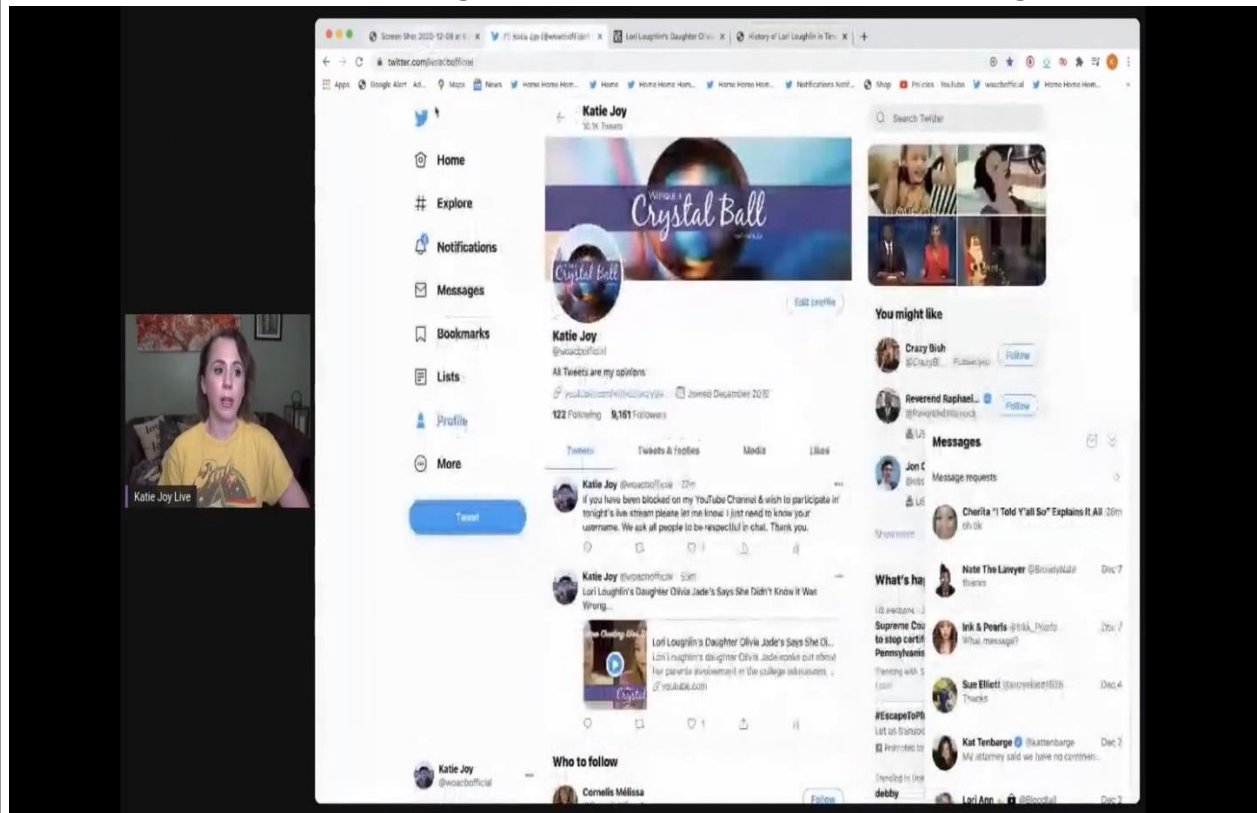


13. I have also obtained screenshots of other tweets from Lori Ann Barnhart's Twitter page @bloodtall wherein Ms. Barnhart publicly displays her support of Ms. Paulson in her page description and in her tweets. In a screenshot of one tweet from June 20, 2020, Ms. Barnhart defends Ms. Paulson against internet trolls – a subset of people that harass others on the internet:



14. I have also observed a video published on December 8, 2020 on Ms. Paulson's YouTube channel named Without a Crystal Ball wherein Ms. Paulson is featured. The name of the video I viewed is "Lori Loughlin's Daughter Olivia Jade's Says She Didn't Know It Was Wrong to Cheat to Get Into USC," and can be found at <https://youtu.be/z97KQgkMWGQ>. Ms.

Paulson is seen in this video at the 12:51 time mark sharing her computer screen for all of her viewers to see. At the 12:51 time mark, Ms. Paulson shows all her viewers her Twitter page screen, which has a list of people with whom Ms. Paulson was communicating privately through Twitter's direct message feature. This direct message list that Ms. Paulson showed all of her viewers contains Ms. Barnhart's name and account on the bottom, and information showing that Ms. Paulson and Ms. Barnhart were conversing privately with one another as late as December 2, 2020. The following is a true and correct screenshot of the 12:51 time mark of the aforementioned video from Ms. Paulson's YouTube channel where in Ms. Paulson shows her Twitter computer direct message list, with Ms. Barnhart's direct message information disclosed at the bottom right corner:



15. In addition to Ms. Barnhart making threats involving violence, I was disturbed to discover in my investigation of Ms. Barnhart that she had criminal charges involving acts of

1 violence filed against her in the State of Washington. Based upon this discovery and the prior
2 threats that Ms. Barnhart has made against me personally and others generally, I have been, and
3 continue to be in reasonable fear for my and my family's personal safety, from both Ms.
4 Barnhart and Ms. Paulson, as it is my personal observation that Ms. Paulson intentionally
5 instructs, encourages, and/or condones Ms. Barnhart's harassment and intimidation of Ms.
6 Paulson's perceived enemies. Attached hereto as Exhibit "1" is a true and correct copy of
7 redacted charging documents against Lori Ann Barnhart from 2012 obtained from the Superior
8 Court of Washington Snohomish County, which are publicly on the Court's website at:
9 <https://snohomishcountywa.gov/197/Superior-Court>.

10
11 I declare under penalty of perjury under the laws of the United States of America that the
12 forgoing is true and correct.

13
14 SIGNED on December 19, 2020.

15
16
17 _____
18 Kim Fulmer

EXHIBIT “1”

FILED

2012 JUL 27 AM 11:09

SONYA KRASKI
COUNTY CLERK
SNOHOMISH CO. WASHSUPERIOR COURT OF WASHINGTON
FOR SNOHOMISH COUNTY

THE STATE OF WASH. STON,

Plaintiff,

No. 12-1-01609-1

v.

SUMMONS

BARNHART, LORI ANN

Defendant.

THE STATE OF WASHINGTON TO:

LORI ANN BARNHART

STANWOOD, WA

You are hereby charged with a criminal offense by Information on file in this court.

THEREFORE, in the name of the State of Washington, you are commanded to appear on AUGUST 13, 2012, at 3:00 PM, for Arraignment Hearing. Report to Room 304, 3rd Floor, Snohomish County Courthouse, 3000 Rockefeller Ave., Everett, Washington.

FAILURE TO APPEAR WILL RESULT IN A WARRANT BEING ISSUED FOR YOUR ARREST.

I hereby certify that I deposited in the United States mail a properly addressed envelope directed to the above name and address containing a copy of the attached information and this summons directing appearance in Superior Court on the above-mentioned date.

Sonya Kraski, Snohomish County Clerk and ex-officio Clerk of this Court.

By B. MacLennan
Deputy Clerk

Issued: JUL 19 2012

Name or ID# Jean MaynardDATED: 7-27-12

IF YOU WANT TO HAVE A LAWYER TO REPRESENT YOU IN THIS CASE, YOU SHOULD APPEAR IN COURT WITH YOUR LAWYER ON THE DATE INDICATED ABOVE. IF YOU CANNOT AFFORD A LAWYER AND BELIEVE YOU MAY BE ELIGIBLE FOR A LAWYER APPOINTED AT PUBLIC EXPENSE, YOU SHOULD AS SOON AS POSSIBLE, CONTACT THE DEPARTMENT OF ASSIGNED COUNSEL AT 3000 ROCKEFELLER RM C103, EVERETT, WASHINGTON AT (425-388-3500) 8:30 AM TO 11:45 AM AND 1:00 PM TO 4:00 PM. A \$10.00 SCREENING FEE WILL BE ASSESSED AT THE TIME YOUR ELIGIBILITY FOR APPOINTED COUNSEL IS DETERMINED. THAT FEE MAY BE WAIVED UNDER CERTAIN CIRCUMSTANCES. YOU SHOULD CONTACT YOUR LAWYER OR THE DEPARTMENT OF ASSIGNED COUNSEL AT LEAST 24 HOURS IN ADVANCE.

5